



GLOBAL RESOURCE ACTION CENTER FOR THE ENVIRONMENT

March 26, 2003

Helaine Lerner  
Board Chair

Alice Slater  
President

William J. Weida  
Project Director

*Advisory Committee*

Oscar Arias  
Barbara Bergman  
Selma Brackman  
Kim Brizzolara  
Jacqueline Cabasso  
Helen Caldicott  
Manas Chatterji  
Mark Dowie  
Lloyd Dumas  
Gary Ferdman  
Shirley Fingerhood  
Hamilton Fish  
Karl Grossman  
Hazel Henderson  
Walter Isard  
Michio Kaku  
Inge Kaul  
Patti Kenner  
David Korten  
David Krieger  
Gloria Lawrence  
Robert S. Lawrence  
Sidney Lerner  
Leonard Marks  
Ann Markusen  
Myriam Miedzian  
James Parks Morton  
Monroe Price  
Mark Ritchie  
Douglas Roche  
Stanley Sheinbaum  
Henry Spira (1927-1998)  
Emily Squires  
Theodore B. Taylor  
Grace Thorpe  
Stanley Weithorn  
Alan Woltz

**Chief, Standardization Branch,  
Livestock and Seed Program, AMS,  
USDA Agriculture Marketing Service**  
Room 2603-S, Stop 0254  
1400 Independence Avenue, SW,  
Washington, DC 20250-0254;  
cc: [marketingclaim@usda.gov](mailto:marketingclaim@usda.gov).

**Re: Docket Number LS-02-02** [concerning Meat Marketing  
Claims and urge the Agricultural Marketing Service of USDA]

To whom it may concern:

I am writing to express my concerns about proposed meat marketing labeling claims and standards.

After careful review of the proposed standards, I am concerned that these claims could undermine the integrity of the labels they seek to define, mislead consumers, and have a devastating affect on small and mid-sized farmers such as myself, who are pioneers of these marketing claims. I am also concerned that USDA did not take the time to get input from family farmer, consumer, humane, and environmental groups in drafting the proposed standards, but instead conferred primarily with large-scale, industrial agricultural interests.

I am hereby asking USDA to withdraw the proposed meat marketing labeling standards and undertake a more extensive and inclusive process for writing such labeling claims with substantial input from family farm, consumer, humane, and environmental organizations, and urge the USDA to do the following:

- 1) **Withdraw proposed meat marketing claims and standards and reformulate them.** Urge them to consult closely with family farm, consumer, humane, and environmental organizations before issuing a final proposal.
- 2) I am a consumer who is seriously committed to being able to purchase grass-fed, free-range, and antibiotic free meat and want proposed USDA claims to meet my expectations.
- 3) Also, personally as a farmer in upstate New York State, I would also like to see standards for these labels that ensure consumer confidence and provide me with an important value-added market.

4) In addition, although the proposed label claim for "no antibiotics used, or raised without antibiotics," is satisfactory, USDA's proposed label claim for "no sub-therapeutic antibiotics added or not fed antibiotics" is *not*.

5) The claim stating "no sub therapeutic antibiotics added" has serious *definitional* problems. USDA does not define the term "sub therapeutic" and other institutions have varied and conflicting definitions.

The proposed labeling claim for "no detectable antibiotic residue," could mislead consumers to believe that they are purchasing meat from producers whose practices do not contribute to antibiotic resistance, even though producers using the claims are using antibiotics.

6) Also, the label claim for "Grass-Fed" appears to create a *loophole* for producers who want to market their livestock as grass-fed when in fact the animal is receiving grain supplements for a large percentage of their production cycle.

Furthermore, the grass-fed claim could confuse consumers who buy grass-fed meat for specific, nutritional benefits only achieved when livestock are strictly grass-fed in the final months before slaughter.

7) Finally, the claim for "Free-Range, Free-Roaming and Pasture-Raised" meat has *definitional* problems as well. The Notice defines these label claims as "Livestock that have had continuous and unconfined access to pasture throughout their life-cycle, including: Cattle and Sheep- which shall never be confined to a feedlot; and Swine which shall have continuous "access" to pasture for at least 80% of their production cycle.

The proposed labeling claims do not provide a definition for "feedlot" as it relates to Cattle and Sheep and they do not define "access" in the case of swine. Furthermore, it is unclear whether the whole-herd, including the breeder stock for the livestock being produced, are raised continuously under these minimum standards.

Sincerely,



Leslie Seff

Director,  
GRACE Sustainable Energy Project